

PSJ10 Exh 61



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20  
21  
22  
23  
24

1 security access to release a credit hold,  
2 much like the same, no other groups had  
3 access to those holds.

4 Q. Understood. So you can put  
5 that exhibit aside for -- for now, we may  
6 come back to it later.

7 A. Okay.

8 Q. But I want to return to  
9 Exhibit 2.

10 A. Oh.

11 Q. And just discuss. So you've  
12 listed three different, one, two, three.  
13 You've listed your -- your time at  
14 Actavis, Allergan, and Teva as three  
15 different entries. It says Actavis 2008  
16 to 2013, Allergan 2008 to 2017, and Teva  
17 2008 to 2017; is that correct?

18 A. It's probably a little  
19 confusing the way it reads. I had a  
20 resumé writer take my resumé, and -- and  
21 they did my LinkedIn profile. And I  
22 guess this is the way they thought it  
23 should appear.

24 Q. Understood.

1                   A.        But it's -- it's all one  
2                   company.

3                   Q.        Do you remember when you --  
4                   when you began your employment at -- at  
5                   Actavis in 2008, which company hired you?

6                   A.        When I began my employment  
7                   with Actavis, which company hired me?  
8                   Actavis.

9                   Q.        Okay. Is that -- do you  
10                  remember which Actavis? Can you be more  
11                  specific? Actavis Inc.?

12                  A.        I don't know the -- the  
13                  legal entity name, Actavis Inc., LLC, I  
14                  don't know.

15                  Q.        Okay.

16                  A.        So, you know.

17                  Q.        So at some point during your  
18                  employment at Actavis, Watson came in and  
19                  acquired the company.

20                  A.        Correct.

21                  Q.        Is that correct?

22                  A.        Yes.

23                  Q.        Did your job duties change  
24                  at that point?

1                   A.        Yes.   The -- the role not so  
2                   much but the -- the magnitude did.   I  
3                   mean the volume obviously.   So to explain  
4                   that, Watson had its customer service  
5                   group headquartered in California,  
6                   Irvine, California.   And the decision was  
7                   made that they wanted to have customer  
8                   service in a corporate location, which  
9                   the decision was Parsippany, New Jersey.

10                   So I was given the  
11                   opportunity to build the new combined  
12                   team.   And when I say build, we had to  
13                   build it virtually from the ground up.  
14                   Actavis was a much smaller company at the  
15                   time and the customer service group for  
16                   Watson, I'm just going to take a guess,  
17                   maybe they had 15, 20 employees.   I  
18                   don't -- I don't remember the number  
19                   exactly.   Very seasoned.   I mean their  
20                   average years of service were probably  
21                   like 20 years, so a very seasoned team.  
22                   So it was my job to build a team in  
23                   Parsippany, New Jersey, to ensure that we  
24                   didn't skip a beat, that there was never

1 Q. Okay. And do you recognize  
2 the attachment?

3 A. Yes.

4 Q. Okay. So please go ahead  
5 and read through the e-mail exchange.

6 A. Okay. So I haven't read the  
7 entire letter in the back. But I get the  
8 gist of what it was doing at the time.

9 Q. And I don't have specific  
10 questions about the letter.

11 A. Okay.

12 Q. What I would like to know is  
13 whether or not -- do you know whether or  
14 not this campaign was ever implemented?

15 A. Yes.

16 Q. Okay. Was this campaign  
17 ever implemented?

18 A. Yes, it was.

19 Q. And how was it implemented?

20 A. I wasn't involved with the  
21 implementation, so I don't have the  
22 details. But I recall some aspects of  
23 it.

24 Q. Okay. So I'm just going to

1 ask you a few questions, and then we're  
2 going to take a break and then we might  
3 be close to finishing.

4 So do you know whether or  
5 not Actavis belonged to the -- certain  
6 trade organizations, any trade  
7 organizations?

8 A. It depends. Do you define  
9 that trade organization like HDMA or  
10 NACDS? That's a trade organization.

11 Q. So do you know if Actavis  
12 ever belonged to the Healthcare  
13 Distribution Alliance?

14 A. I'm not familiar with that.  
15 So I don't know.

16 Q. Okay. If I called it the  
17 HDA, would that make more sense? Do you  
18 know if Actavis ever --

19 A. HDMA, but not HDA.

20 Q. So we'll go with the  
21 Healthcare Distribution Management  
22 Association. Do you know if Allergan  
23 ever belonged to the HDMA?

24 A. I don't know how HDMA works,

1 if it's -- a corporation belongs to it or  
2 if individuals belong to it. I know that  
3 I was not a personal member. But I know  
4 that there were employees who were.

5 Q. Do you recall ever  
6 participating in any webinars or any  
7 other meetings related to the HDMA?

8 A. We had a conference, like an  
9 HDMA conference.

10 Q. Do you recall a specific  
11 conference that you attended?

12 A. No, it was just like a  
13 meeting where you meet with your  
14 customers. And from what I remember, I  
15 think that was the one I mentioned  
16 earlier. I think I only went once. It  
17 was kind of like speed dating.

18 You know, it's just a chance  
19 where all your customers are in one place  
20 at the same time, and you have many  
21 meetings. It's not like you're there to  
22 achieve any major objectives. It's more  
23 like get together, hey, what are the big  
24 subjects, how are things going.

1                   They -- they joked and they  
2 referred to it as speed dating. I don't  
3 know much more about HDMA than that.  
4 Sorry.

5                   Q.     You don't have to apologize.  
6                   Did you ever give a  
7 presentation regarding suspicious order  
8 monitoring issues to a conference?

9                   A.     To a conference? No, I  
10 don't believe so. I've only been to a  
11 few conferences and they wouldn't have  
12 been something that I presented.

13                  Q.     Have you ever authored any  
14 articles regarding suspicious order  
15 monitoring?

16                  A.     Articles, no.

17                  Q.     Have you ever participated  
18 on any panels regarding suspicious order  
19 monitoring?

20                  A.     No.

21                  Q.     As part of your meetings  
22 with AmerisourceBergen, Cardinal and  
23 McKesson, following the September 2012  
24 DEA conference, did you enter into any

1 agreements with them regarding the duty  
2 to prevent diversion?

3 A. There were no agreements on  
4 that topic that I'm aware of, no.

5 MS. ANTULLIS: I think we're  
6 going to go off the record now and  
7 take a break.

8 THE VIDEOGRAPHER: The time  
9 is 4:28 p.m. Off the record.

10 (Short break.)

11 THE VIDEOGRAPHER: We are  
12 back on the record. The time is  
13 4:40 p.m.

14 BY MS. ANTULLIS:

15 Q. All right. So I just have a  
16 couple of follow-up questions for you,  
17 and I will be done.

18 First question is, during  
19 any of the breaks that we've taken today  
20 have you discussed your testimony that  
21 you've given with your attorneys?

22 A. Not more than, you know,  
23 you're doing a great job, you know, very  
24 basic like that. This is my first